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REMARKS

This response is intended as a full and complete response to the Office Action dated July 30, 2003. In view of the amendments and the following discussion, the Applicant believes that all claims are in allowable form.

CLAIMS 21 AND 25

The Applicant has amended claim 21 to correct dependency and claim 25 to correct a minor grammatical error. The Applicant submits that the scope of claims 21 and 25 remains unchanged.

CLAIM REJECTIONS

A. 35 U.S.C. §112 Claims 1-20 and 40

Claims 1-20 and 40 stand rejected as being indefinite. With respect to claim 1, the Applicant respectfully disagrees. With respect to the remaining claims, the Applicant has amended claim 5 to clarify the dependency of the claim and has amended claim 40 to clarify to claim with respect to the first motion device.

The Examiner asserts that the phrase "inward of the first side" recited in independent claim 1 is unclear. The Applicant submits that one skilled in the art would understand that a side defines a boundary and that "inward of the side" is a direction towards the center of the machine and "outward of the side" would be a direction away from the machine. Moreover, the direction "inward of the first side" is defined in the specification and drawings. (see Figure 6 and Specification, paragraph 55). Accordingly, the Applicant respectfully requests the rejection be withdrawn.

B. 35 U.S.C. §102(b) Claim 1

Claim 1 stands rejected as being anticipated by United States Patent No. 6,062,954 issued May 16, 2000 to *Izumi*, (hereinafter "*Izumi*"). The Applicant respectfully disagrees, but has amended claim 1 to more clearly recite aspects of the invention. The Applicant believes that the scope of claim 1 remains unchanged.

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Independent claim 1 recites limitations not taught, shown, or suggested by *Izumi*. *Izumi* teaches a semiconductor wafer surface flattening apparatus having plural polishing heads, plural platens, load cups, a first motion device (index table supporting load cups), and a second motion device (robot). However, *Izumi* does not teach, show or suggest a first motion device coupled to a second motion device, and the second motion device coupled to a load cup, wherein the second motion device moves the load cup, and the first motion device moves the second motion device (and therefore the load cup that is coupled to the second motion device). In *Izumi*, the first motion device (index table) is installed on the base, and the second motion device is not attached to the first motion device, as recited by claim 1. (*Izumi*, col. 7, ll. 52-57; Fig. 5). Furthermore, the second motion device (robot) is not movable by the first motion device (index table), as recited by claim 1, as amended.

Thus, the Applicant submits that claim 1 is patentable over *Izumi*. Accordingly, the Applicant respectfully requests the rejection be withdrawn.

NEW CLAIMS

New claims 56-65 have been added. The Applicant believes that claims 56-65 are fully supported by the specification and that no new matter has been entered. Thus, the Applicant respectfully requests allowance of these claims.

ALLOWED CLAIMS

The Applicant thanks the Examiner for his comments regarding the allowability of claims 21-39 and claims 2-20 and 40 if amended to overcome the rejections under 35 U.S.C. §112, second paragraph. As discussed above, the Applicant believes that claim 1 is in allowable form. In addition, the Applicant has amended claims 5 and 40 to address the 35 U.S.C. §112 rejections. As such, the Applicant submits that all the claims are in allowable form.

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Thus, the Applicant submits that all claims now pending are in condition for allowance. Accordingly, both reconsideration of this application and its swift passage to issuance are earnestly solicited.

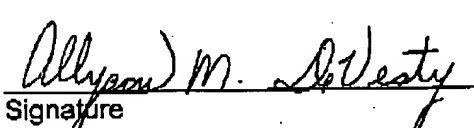
If, however, the Examiner believes that any unresolved issues still exist, it is requested that the Examiner telephone Mr. Keith Taboada at (732) 530-9404 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully submitted,

Oct 8, 2003

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I hereby certify that this correspondence is being transmitted by facsimile under 37 C.F.R. §1.8 on October 8, 2003 and is addressed to Mail Stop Non-Fee Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, Facsimile No. (703) 872-9302.



SignatureAllyson M. DeVesty

Printed Name of Person Signing10-8-03

Date of signature